

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herein. The present amendment is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-119 are pending in this application. Claims 1, 55-58, and 112-119, which are independent, are hereby amended. Support for this Amendment is provided through the Specification as originally filed, and specifically at pages 64-74 and Figures 70-82.

No new matter has been introduced by this amendment. Changes to the claims were not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes were made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### **II. REJECTIONS UNDER 35 U.S.C. §103(a)**

Claims 1-4, 7, 10, 12, 17, 21, 25, 29, 33, 51, 52, 64, 67, 69, 74, 78, 82, 86, 90, 108, 111, and 115-119 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 6,567,800 to Barrera et al. (hereinafter "Barrera") in view of U.S. Patent No. 6,282,548 to Burner et al. (hereinafter "Burner").

Claims 5 and 62 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Barrera in view of Burner and further in view of U.S. Patent No. 6,311,058 to Wecker et al. (hereinafter "Wecker").

Claims 6, 8-9, 14-16, 18-20, 22-24, 26-28, 30-32, 63, 65, 66, 71-73, 75-77, 79-81, 83-85, 87-89, and 114 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Barrera in view of Burner, and further in view of U.S. Patent No. 6,394,354 to Wilz, Sr. et al. (hereinafter “Wilz”).

Claims 11, 13, 53, 68, 70, and 109 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Barrera in view of Burner, and further in view of U.S. Patent No. 6,311,214 to Rhoads (hereinafter “Rhoads”).

Claims 34-48, 50, 54, 56, 91-106, 110, and 113 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Barrera in view of Burner, and further in view of U.S. Patent No. 6,505,212 to Nakano et al. (hereinafter “Nakano”).

Claims 55 and 112 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Barrera and Burner in view of Wilz and Nakano.

As understood by Applicants, Barrera relates to a system and method for searching websites using category information to narrow the scope of the website content search.

As understood by Applicants, Burner relates to a method and apparatus for displaying metadata about an existing web page that is currently being displayed by a web browser.

As understood by Applicants, Wecker relates to a system by which information content data is delivered to a mobile device.

As understood by Applicants, Wilz relates to an Internet-based system and method for routing, tracking and delivering packages.

As understood by Applicants, Rhoads relates to a printed object with encoded bit data. When such an object is presented to an optical sensor, the bit data is decoded and used to establish a link to an Internet address corresponding to the object.

As understood by Applicants, Nakano relates to a system and method for file management and “version control.”

Applicants respectfully submit that the present claims are patentable over the cited references for at least the following reasons.

A. Cited references fail to meet all claim limitations

Claim 1 recites, *inter alia*:

**“... generating one or more interfaces to one or more external components on the one or more pages of the web site;**

**registering the one or more interfaces of the one or more external components; ...”** (Emphasis added)

Applicants respectfully submit that nothing has been found in Barrera, Burner, Wecker, Wilz, Rhoads, or Nakano, taken alone or in combination, that would teach or suggest the above-identified features of claim 1. Specifically, the cited references, taken alone or in combination, fail to teach or suggest generating one or more interfaces to one or more external components on the one or more pages of the web site. Additionally, the cited references, taken alone or in combination, fail to teach or suggest registering the one or more interfaces of the one or more external components, all as recited in claim 1.

B. Office Action has failed to establish a *prima facie* case for obviousness

Applicants respectfully submit that MPEP §2143.01(III) states that

**“The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. *In re***

*Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990)”  
(Emphasis added)

Applicants respectfully submit that the Office Action has failed to provide a suggestion or motivation to combine the teachings of Barrera and Burner, and to further modify that combination as allegedly suggested by Wecker, Wilz, Rhoads, and/or Nakano. Indeed, Applicants respectfully submit there is no motivation anywhere in the art of record or within the knowledge of one of ordinary skill in the art to suggest the applied combinations. Since there is no motivation in the references themselves, the Office Action has relied on impermissible hindsight to create a mosaic of features from the prior art in a futile attempt to create a vague resemblance of Applicants’ claimed invention.

None of the cited references, either alone or in combination, teach, suggest or motivate a skilled artisan to develop or practice the instant invention. To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation to modify the reference or to combine reference teachings either in the references themselves or in the general knowledge available to one of ordinary skill in the art; second, there must be a reasonable expectation of success; third, the prior art reference or references must teach or suggest all the claim limitations. MPEP § 2143. It is, however, impermissible for the Office Action to use hindsight based on an Applicants’ disclosure to determine that an Applicants’ claimed invention is obvious in view of the cited art. MPEP § 2142. The motivation or teaching to make the claimed combination by modifying or combining prior art references must be found in the prior art and not in the Applicants’ own disclosure. *In re Vaeck*, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991).

The Office Action has ignored two important elements of substantiating a rejection under 35 U.S.C. § 103(a), namely (1) “to provide some suggestion of the desirability

of doing what the inventor has done,” and (2) demonstrating that “there must be a reasonable expectation of success.” MPEP § 706.02(j) (emphasis added). Because of these deficiencies in the rejection, Applicants respectfully request the withdrawal of the §103 rejections.

Accordingly, because two of the “basic criteria” of obviousness have not been, and cannot be established, the Office Action has failed to present a *prima facie* case of obviousness.

Therefore, for at least these reasons, independent claim 1 is patentable.

Independent claims 55-58, and 112-119 are similar, or somewhat similar, in scope and are therefore patentable for similar, or somewhat similar, reasons.

### III. DEPENDENT CLAIMS

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

### CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited references, it is respectfully requested that the Examiner specifically indicate the portions of the references providing the basis for a contrary view.

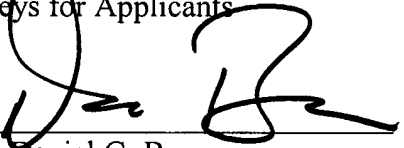
Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

FROMMER LAWRENCE & HAUG LLP  
Attorneys for Applicants

By



Daniel G. Brown  
Reg. No. 54,005  
(212) 588-0800